

1 J. Noah Hagey, Esq. (SBN: 262331)  
2 [hagey@braunhagey.com](mailto:hagey@braunhagey.com)  
3 Adam S. Cashman, Esq. (SBN: 255063)  
4 [cashman@braunhagey.com](mailto:cashman@braunhagey.com)  
5 Greg Washington, Esq. (SBN: 318796)  
6 [gwashington@braunhagey.com](mailto:gwashington@braunhagey.com)  
7 BRAUNHAGEY & BORDEN LLP  
8 747 Front Street, 4th Floor  
9 San Francisco, CA 94111  
10 Telephone: (415) 599-0210

11 Faith Barksdale, Esq. (*pro hac vice* admission)  
12 [barksdale@braunhagey.com](mailto:barksdale@braunhagey.com)  
13 BRAUNHAGEY & BORDEN LLP  
14 118 W 22nd Street, 12th Floor  
15 New York, NY 10011  
16 Telephone: (646) 829-9403

17 [Other counsel of record indicated on docket.]

18 *Attorneys for Defendants / Counter-Plaintiffs*  
19 *IMPOSSIBLE LLC and JOEL RUNYON*

20  
21  
22  
23  
24  
25  
26  
27  
28  
**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

17 IMPOSSIBLE FOODS INC.,  
18 Plaintiff / Counter-Defendant,  
19 v.  
20 IMPOSSIBLE LLC and JOEL RUNYON,  
21 Defendants / Counter-Plaintiffs.

Case No. 5:21-cv-02419-BLF (SVK)

**DECLARATION OF ADAM CASHMAN  
IN SUPPORT OF PARTIES' JOINT  
STIPULATED REQUEST TO MODIFY  
TIME**

Judge: Hon. Beth Labson Freeman

1 I, Adam Cashman, declare:

2 1. I am an attorney licensed to practice before this Court and am counsel of record on  
3 behalf of Defendants/Counter-Plaintiffs Impossible LLC and Joel Runyon (together  
4 “Defendants/Counter-Plaintiffs”). I make this declaration based on personal knowledge. If called as  
5 a witness, I could and would testify competently to the facts stated herein.

6 2. The close of fact discovery in this action is set for April 14, 2025. (*See* Dkt. 113 at 4.)  
7 Plaintiff/Counter-Defendant Impossible Foods Inc. (“Plaintiff/Counter-Defendant”) filed its Third  
8 Amended Complaint (the “TAC”) on March 7, 2025. (Dkt. 151.) The Court issued a Summons in a  
9 Civil Action in connection with the TAC to Defendant/Counter-Plaintiff Joel Runyon on March 16,  
10 2025, Dkt. 158 (the “Summons”), which counsel for Mr. Runyon agreed to accept by email on March  
11 18, 2025.

12 3. To promote efficiency and allow for the filing of a single, unified responsive pleading in  
13 response to the TAC, my office requested that Plaintiff/Counter-Defendant agree that the responsive  
14 pleading for both Defendants/Counter-Plaintiffs be filed and served on or before March 31, 2025.  
15 Plaintiff/Counter-Defendant agreed to this request, which will not affect any other pending deadlines.

16 4. There have been two previous scheduling modifications in this action:

- 17 • Dkt. 101 – Order Granting Impossible Foods’s Motion to Amend
- 18 Complaint and Scheduling Order in Part; and
- 19 • Dkt. 113 – Order Granting Stipulated Request for Order Changing Time

20 I swear under penalty of perjury under the laws of the United States that the foregoing is true and  
21 correct.

22 Dated: March 20, 2025

23 By: /s/ Adam S. Cashman  
Adam S. Cashman

24 *Attorney for Defendants / Counter-Plaintiffs*  
25 *Impossible LLC and Joel Runyon*